Docket No. 05-015-1
Regulatory Analysis and Development
PPD, APHIS, Station 3C71
4700 River Road, Unit 118
Riverdale, MD 20737-1238

National Animal Identification System; Notice of Availability of a Draft Strategic Plan and Draft Program Standards

The Wyoming Livestock Board (WLB) is pleased to have the opportunity to provide comments on Docket No. 05-015-1. The Wyoming Livestock Board is the state organization in Wyoming that will be responsible for the premise allocation system and the animal identification and tracking for the state of Wyoming.

Following are answers to some of the specific questions raised in the docket:

Is a mandatory identification program necessary?
It appears that a mandatory system is necessary in order to achieve the NAIS Goal. However, there have been several times in history when it has been necessary to trace animals where joint federal, State and industry efforts have performed in exemplary fashion and accomplished traceability or tracking without a mandatory system in place. Certainly achieving 48-hour traceability in each or all species reliably and without serious disruption of commerce on a large-scale basis would best be accomplished through a mandatory identification and rapid tracking system. However, mandatory identification can easily have unintended effects on industry infrastructure, especially if the marketing system is unable or unwilling to comply.

At what point and how should compliance with a requirement that producers be responsible for identification be ensured?
Overall compliance will best be assured if the following conditions are met:

- A reliable and "long-term use" identification technique has been developed and field-tested for all species involved.
- Identification devices are easily and quickly available to producers at a low price.
- An education and outreach program (national, State and local levels) on what is expected of producers and why is conducted well in advance of the implementation date with measured results on people reached.
- Compliance achievements should be measured by realistic expectations by anticipated time-lines.

If too much pressure is put on producers to become compliant before they enter interstate commerce (ie arrive at a livestock market) it may hinder their ability to sell animals in normal channels and force them to go out of business. There should be a method for producers to move animals into commerce and document their origin at the time of sale or arrival at the market, fair, etc. and pay a fee if necessary for the animals to be identified as a group or individually there if the producer does not have the ability to perform that task at their farm or ranch.

Also, if producers are allowed to use an individual animal numbering system that is <u>not</u> random, as in the case of the current scrapie program for sheep, it will help them use this system for their production

information and encourage compliance. This can be achieved with the use of the premise number on the tag (which is unique) and then a unique number for the animal for that year, and thus a visual system can be used much easier and with less opportunity for input error. Once the numbers of the animals have been entered into an electronic database, then the information is easily accessible in the case of a disease outbreak.

The system for using Certificates of Veterinary Inspection for the interstate movement of livestock is well founded and serves a vital purpose in protecting animal health. Enforcement activities of compliance with producer-applied animal identification could be focused both toward livestock assembly points and toward auditing Health Certificates. The State of Wyoming would like to combine the use of electronic health certificates with the identification and movement of animals for disease traceback.

In what manner should compliance with identification and movement requirements (direct sales) be achieved; who should be responsible for meeting these requirements and how can the transactions be inputted?
If Certificates of Veterinary Inspection are required to have recorded NAIS animal or Group ID numbers, these certificates and the State Veterinarian's records system can be audited for compliance. Spot audits of records held by producers, feeders and slaughtering establishments along with state database records should provide compliance and enforcement information.

Should age of animal trigger identification or should all animals be identified regardless of age when entering commerce or being commingled?
To fully achieve the NAIS Goal, all animals would need identification (either individual or group/lot) at the point that they enter commerce or are commingled. However, achieving reasonable compliance will require progress in stages, not just timelines. We believe that beginning with breeding animals, as was done with the scrapie program ID requirements is both logical and allowed APHIS, the States and industry to address some of the more difficult issues during the gear-up phase. With sheep, it will be much easier to add group/lot identification and reporting for the majority of feeder and slaughter animals. The same will be true for cattle moved from large ranch holdings in the West to feedlots. We do not believe that it is necessary to electronically identify animals on the ranch until they enter into commerce or are commingled.

Are the timelines realistic?
Each livestock industry segment will have challenges unique to that segment in obtaining producer involvement in the NAIS program. The WLB feels that IF the technology for identification can be refined and the systems for recording and tracking animals perfected and usable in field conditions, then the program can be successfully implemented. However, if sufficient time and monetary resources are not put into the research and field testing of equipment and technology, it is unrealistic to believe that a system can be satisfactory within the current timelines. Further, adding group/lot identification and recording for feeder and slaughter lambs and feeder cattle will help facilitate the implementation of the system.

Should requirements be implemented across all species according to the same timeline?
Realistically, some species will be able to achieve compliance quicker than others. We believe that it is appropriate to set reasonable goals for implementing NAIS for each species and work toward

livestock industry-wide implementation on a uniform compliance date that is recognized as being achievable are reasonable by each industry. If some industries would be required to implement identification systems while others would not, those required to do so could be disadvantaged.

As mentioned, the long-term testing of electronic identification techniques and equipment with sheep and cattle under diverse climatic and management conditions is essential in achieving uniform implementation in a workable and successfully manner by 2009. It would be a mistake to force an untested identification program on an entire industry.

What are the most cost-effective ways for submitting information?
Electronic file transfer is likely the most cost-effective and fastest method provided the file formats of submitted data are compatible with database requirements. However, backup systems should always be available. It is important to realize that many producers and some markets may not have access to or the ability to use electronic input or management of data. Animal identification and tracking may be most needed at times when there are problems with communications systems---natural disasters, computing server shut-downs, transportation blockages. There should be multiple systems in place for redundancy and security, i.e. electronic (computer), phone, fax, and mail data submission. Data submission by means other than electronic, could delay entry into the database beyond the 48 hour goal.

What information should be protected from disclosure?
Information that is pertinent to the animal(s) identification and movement should be available to the responsible federal and State government officials for database maintenance and for use in disease control. Information that is extra to those basic needs should be protected from disclosure.

How could USDA minimize the burden associated with the development and maintenance of records?
We believe that it is the movement of animals that should trigger the need for reporting and recordkeeping. Therefore if a producer sells one animal or a group of animals, this information should be recorded. Likewise, if the buyer of these animals moves them from the original producers' location, the buyer should record the movement and the animals' number(s). The burden associated with the development and maintenance of records can be minimized to a large extent by incorporating NAIS requirements into existing "normal" records systems rather than creating additional or redundant systems. The handling of groups/lots of animals is important to this record keeping process.

Also, if consecutive individual numbers can be used, as in the current scrapie program, rather than the random numbering systems that are being proposed, this will greatly facilitate the record keeping procedure at the producer level. This is especially true for producers that do not have access to electronic means of maintaining records and will be relying on a visual system.

Third party involvement in managing a national database for holding animal location and movement information.
The WLB IS NOT in favor of having a private database system to hold information on animal location or movement. As a state government entity, the WLB prefers a system where the states will hold that

information and only allow access at levels to state and national animal health authorities on an as needed basis. The states already have a system in place for checks and balances to ensure that information will be securely held and not used for any other purpose than animal disease tracking and prevention. The WLB believes that there is no need to have both a private and state system as ultimately the producers will have to pay for management and implementation of systems at any level.